

Adrian Boot v. Consequence Sound LLC Case No.: Case 9:23-cv-80616-RLR
EXHIBIT 2 – Time Billing Records

DATE	TIME KEEPER	TASK	TIME	RATE (HR)	BILL
3/30/2023	Ryan Feldman	Review of new case file from client; reviewed infringements, copyright registration certificates and website screengrabs; prepare initial draft of complaint.	1.5	\$125	\$187.50
3/30/2023	Craig Sanders	Reviewed draft complaint; reviewed infringements, registration, SOS information; approved to forward to client for verification	0.5	\$700	\$350.00
3/30/2023	Ryan Feldman	Prepared letter to client re:	0.4	\$125	\$50.00
4/6/2023	Jason Rosenthal	Prepared request for summons; civil coversheet; A0121 forms; prepared complaint and exhibits for ECF filing	0.8	\$125	\$100.00
4/6/2023	Jason Rosenthal	ECF commenced new copyright case in FLSD	0.4	\$125	\$50.00
4/6/2023	Jason Rosenthal	Downloaded summons; prepared packet for process server; forwarded to Gotcha Legal Service	0.5	\$125	\$62.50
4/12/2023	Craig Sanders	Reviewed assigned judge and file; assigned to Jaymie to continue; discussion with Jaymie re: same	0.4	\$700	\$0.00
4/12/2023	Jaymie Sabilia-Heffert	Discussion with Craig re: new case assignment	0.4	\$450	\$0.00
4/12/2023	Jaymie Sabilia-Heffert	Prepared and filed Notice of Related Actions and Corporate Disclosure Statement	0.3	\$450	\$135.00
5/3/2023	Jaymie Sabilia-Heffert	Prepared for and conducted initial call with opposing counsel.	0.2	\$450	\$90.00
5/8/2023	Jaymie Sabilia-Heffert	Reviewed, revised, and filed Motion for Extension of Time	0.2	\$450	\$90.00

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5/8/2023	Jaymie Sabilia-Heffert	Reviewed case file and prepared FRE 408 correspondence to send to opposing counsel; emailed to opposing counsel.	0.2	\$450	\$90.00
6/1/2023	Jaymie Sabilia-Heffert	Status email inquiry to opposing counsel	0.1	\$450	\$45.00
6/2/2023	Jaymie Sabilia-Heffert	Reviewed correspondence from opposing counsel including informal offer of judgment	0.2	\$450	\$90.00
6/2/2023	Jaymie Sabilia-Heffert	Forwarded Defendant's letter to Craig; discussion re: letter	0.2	\$450	\$0.00
6/2/2023	Craig Sanders	Discussion with Jaymie re: informal offer of judgment letter	0.2	\$700	\$0.00
6/2/2023	Craig Sanders	Reviewed Defendant's letter; researched for case law on letter purporting to be Rule 68 offer of judgment by non-admitted attorney that included terms in the offer such as a general release; advised Jaymie to discuss results of research with client	1.5	\$700	\$1,050.00
6/6/2023	Jaymie Sabilia-Heffert	Reviewed, revised, and filed second Motion for Extension of Time	0.2	\$450	\$90.00
6/6/2023	Jaymie Sabilia-Heffert	Emailed counsel re: scheduling order, answer deadline and Rule 26 date	0.2	\$450	\$90.00
6/9/2023	Jaymie Sabilia-Heffert	Discussion with client re: results of research on letter purporting to be Rule 68 offer of judgment	0.4	\$450	\$180.00
6/9/2023	Jaymie Sabilia-Heffert	Prepared response to Defendant's 6/2 offer; emailed response to opposing counsel.	0.2	\$450	\$90.00

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6/12/2023	Jaymie Sabilia-Heffert	Reviewed docket and Court Orders; compiled and emailed list of proposed mediators to opposing counsel.	0.2	\$450	\$90.00
6/13/2023	Jaymie Sabilia-Heffert	Emailed counsel reminder re: mediation selection	0.2	\$450	\$90.00
6/14/2023	Jaymie Sabilia-Heffert	Prepared and filed Notice of Mediation Selection.	0.2	\$450	\$90.00
6/14/2023	Jaymie Sabilia-Heffert	Email conversation with opposing counsel re: prior correspondence/offer of judgment; service; mediation	0.5	\$450	\$225.00
6/14/2023	Jaymie Sabilia-Heffert	Prepared and served Plaintiff's Initial Disclosures pursuant to Rule 26(a)(1).	0.4	\$450	\$180.00
6/14/2023	Jaymie Sabilia-Heffert	Scheduled mediation with mediator via website	0.3	\$450	\$135.00
6/15/2023	Jaymie Sabilia-Heffert	Emailed and telephone conversation with Craig re: OOJ	0.5	\$450	\$0.00
6/15/2023	Craig Sanders	Emailed and telephone conversation with Jaymie re: OOJ	0.5	\$700	\$0.00
6/16/2023	Jaymie Sabilia-Heffert	Conducted status call with opposing counsel	0.3	\$450	\$135.00
6/22/2023	Craig Sanders	Research ambiguous offers of judgment and implications for accepting or not accepting in the 11th Circuit	1.8	\$700	\$1,260.00
6/22/2023	Craig Sanders	Email and telephone conversation with Jaymie re: OOJ and fee application	0.5	\$700	\$0.00

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6/22/2023	Jaymie Sabilia-Heffert	Email and telephone conversation with Craig re: OOJ and fee application	0.5	\$450	\$0.00
6/23/2023	Jaymie Sabilia-Heffert	Prepared and served Plaintiff's Notice of Acceptance of Defendant's Rule 68 Offer of Judgment	0.2	\$450	\$90.00
6/26/2023	Craig Sanders	Prepared and filed Notice of Filing of Acceptance of Rule 68 Offer of Judgment	0.4	\$700	\$280.00
6/29/2023	Craig Sanders	Emailed Jaymie re: court order re: proposed order	0.2	\$700	\$0.00
6/29/2023	Jaymie Sabilia-Heffert	Reviewed case docket and Court Order; prepared and filed Proposed Order.	0.2	\$450	\$90.00
7/17/2023	Jaymie Sabilia-Heffert	Conducted legal research in support of Plaintiff's Motion for Attorneys' Fees; Drafted motion and prepare exhibits.	4.5	\$450	\$2,025.00
7/17/2023	Jaymie Sabilia-Heffert	Prepared Bill of Costs for filing	0.2	\$450	\$90.00
7/18/2023	Craig Sanders	Reviewed and edited Plaintiff's Motion for Attorneys' Fees; returned to JSH to finalize/file	2.3	\$700	\$1,610.00
7/18/2023	Jaymie Sabilia-Heffert	Reviewed CS edits and comments to motion; finalized motion draft	1.0	\$450	\$450.00
7/18/2023	Jaymie Sabilia-Heffert	Emailed motion draft, declaration with exhibits, and Bill of Costs to counsel of record in compliance with Local Rules 7.1 and 7.3	0.2	\$450	\$90.00
7/18/2023	Jaymie Sabilia-Heffert	Email exchange with opposing counsel to schedule meeting pursuant to Local Rules 7.1 and 7.3.	0.2	\$450	\$90.00

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7/20/2023	Jaymie Sabilia-Heffert	Conducted meeting with opposing counsel in compliance with Local Rule 7.3 regarding relief requested in Plaintiff's draft motion and Bill of Costs.	0.3	\$450	\$135.00
7/20/2023	Jaymie Sabilia-Heffert	Emailed opposing counsel to confirm Defendant's position regarding Plaintiff's draft motion and Bill of Costs.	0.1	\$450	\$45.00
7/21/2023	Craig Sanders	Reviewed and edited plaintiff's motion	2.5	\$700	\$1750.00
7/24/2023	Craig Sanders	Continued edits to fee application; added Table of Contents and Table of Authorities; re-reviewed rules for FLSD	2.0	\$700	\$1400.00
7/25/2023	Jaymie Sabilia-Heffert	Finalized Plaintiff's motion	0.5	\$450	\$225.00

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Timekeeper	Position	Hourly Rate	Unbilled Hours	Unbilled Extended	Billed Hours	Extended
Craig B. Sanders	Senior Partner (30 th year)	\$700	1.8	\$1,260.00	11.0	\$7,700.00
Jaymie Sabilia-Heffert	Associate (7 th year)	\$450	1.6	\$720.00	11.7	\$5,265.00
Ryan Feldman	Paralegal	\$125			1.9	\$237.50
Jason Rosenthal	Paralegal	\$125			1.7	\$212.50
Total					26.3	\$13,415.00